

# Federal Defenders OF NEW YORK, INC.

Southern District  
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December 22, 2021

**VIA ECF**

The Honorable Edgardo Ramos  
United States District Judge  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, NY 10007

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC # \_\_\_\_\_  
DATE FILED: 12/22/2021

## MEMO ENDORSED

Re: *United States v. Jean Carrenard*, 21 CR 506 (ER)

Dear Judge Ramos:

I respectfully write on behalf of my client, Jean Carrenard, to request a bail modification so that Mr. Carrenard, who is currently subject to home detention, can spend the day and night of Christmas Eve at his mother's Manhattan apartment with his 6-year-old son and other family. If this application is granted, Mr. Carrenard will sleep at his mother's so that he can be with his son when he opens his Christmas presents and then return to his house on Christmas day.

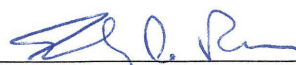
Mr. Carrenard was released on an agreed-upon bail package on May 8, 2021 including a \$100,000 PRB cosigned by 2 FRPs and home detention with location monitoring. Although his release has not been without hiccups, the Court permitted Mr. Carrenard to spend Thanksgiving at his mother's, which he did without incident.

I have reached out to Pretrial Services and the government to get their position on this application but I have not heard back from them. I understand as a policy matter and without exception, Pretrial Services will not consent to social events for defendants on home detention. I assume it takes that position here. The government typically defers to pretrial services.

Respectfully submitted,  
/s/ Julia Gatto  
Julia Gatto  
Assistant Federal Defender

cc: AUSA Zander Li (via email)  
USPT Jonathan Lettieri (via email)

The application is X granted  
\_\_\_\_\_ denied

  
Edgardo Ramos, U.S.D.J.

Dated: 12/22/2021  
New York, New York